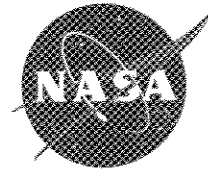


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



September 23, 2010

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance at Events Related to the 61st International Astronautical Congress, September 27 - October 1, 2010

Representatives from NASA have been invited to attend a series of events in conjunction with the 61st International Astronautical Congress (IAC) at the Prague Congress Centre in Prague, Czech Republic. The IAC is intended to enable representatives from the space industry, space users, space policy makers, students, young professionals, researchers and academicians to meet and exchange experiences and knowledge on space-related topics, and to develop worldwide cooperation programs. The IAC is the largest annual event organized by the International Astronautical Federation (IAF), a non-governmental, non-profit membership organization, based in Paris, France. The Congress is hosted by one of the IAF's member countries, which forms a local organizing committee. The events are as follows:

1. Space Generation Congress Closing Dinner, September 25, 2010: The Space Generation Advisory Council, a foreign non-profit under the umbrella of the United Nations, plans to host a dinner at 7:30 p.m. at Charles University in Prague. The dinner signifies the end of the Space Generation Congress, a conference focused on space topics taking place the week prior to the IAC. Approximately 100 people are expected to attend, including domestic and international students, young professionals in the space field, and industry. The maximum benefit per employee is approximately \$20. The NASA Administrator will be speaking at the event.

2. International Academy of Astronautics Awards Dinner, September 26, 2010: The IAA plans to host an awards dinner at 7 p.m. at the Corinthia Hotel. Approximately 200 people are expected to attend, including IAA members and the government heads of numerous space agencies. The maximum benefit per employee is approximately 75€ (\$98.50).¹ The Administrator will be inducted into the IAA at the dinner.

3. IAF Dinner, September 26, 2010: The IAF plans to host a dinner at 8:15 p.m. at the Corinthia Hotel. Approximately 70 people are expected to attend, including representatives from IAF, the government heads of the space agencies, and a number of parliamentarians

¹ Approximations of Euro-denominated figures are as of the date of this determination.

from the Czech Republic and other countries. The maximum benefit per employee is approximately 50€ (\$65.60).

4. IAC Welcome Reception and Opening Festival, September 27, 2010: The IAF is sponsoring a large reception for all IAC attendees and accompanying persons, approximately 500 people. The reception will be held at the Congress Hall at 8 p.m. Invited attendees would include representatives from governments, the space industry, space users, space policy makers, students, young professionals, researchers and academicians. The cost of attendance is included in the registration fees, which NASA has paid on behalf of its employees. Thus, no gift determination is needed.

5. Arianespace Reception, September 27, 2010: Approximately 100 people have been invited to a reception at the Dome of the LBBW Building at 8:00 p.m. The event is sponsored by Arianespace. The cost per person is approximately 75€ (\$98.50) per person. Attendees will include representatives from the U.S. and foreign governments and industry, IAF leaders, and the heads of space agencies.

6. Young Professionals Welcome Reception, September 26, 2010: EADS Astrium will sponsor a reception from 6:00 p.m. to 8:00 p.m. at the Corinthia Hotel. It is open to all attendees under a certain age. Approximately 150 people are expected to attend, including the younger representatives from governments, the space industry, academia, students, and foreign nationals. The cost is approximately \$33 per person.

7. Career and Knowledge Sharing Reception, September 28, 2010: Lockheed Martin will sponsor a reception from 6:00 p.m. to 8:00 p.m. at the Corinthia Hotel. It is open to all attendees under a certain age. Approximately 150 people are expected to attend, including the younger representatives from governments, the space industry, academia, students, and foreign nationals. The cost is approximately \$33 per person.

8. Reception with Google Lunar X-Prize teams, September 30, 2010: Boeing and Aerospace Corporations will sponsor a reception from 6:00 p.m. to 8:00 p.m. at the Corinthia Hotel. It is open to all attendees under a certain age. Approximately 150 people are expected to attend, including the younger representatives from governments, the space industry, academia, students, and foreign nationals. The cost is approximately \$33 per person.

I find that these events meet the requirements of a widely attended gathering as defined in 5 C.F.R. § 2635.204(g). Because of NASA's interest in international collaboration and in the advancement and application of spaceflight and related technologies, I find that there is an Agency interest in having NASA personnel attend. NASA employees whose duties do not substantially affect the sponsors may accept an invitation for free attendance at these events for themselves and their spouses or guests.

NASA employees, whose duties may substantially affect these co-sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their ethics counselor.

Moreover, NASA employees who are in non-career positions, for which the President's Executive Order 13940 requires signing an ethics pledge, may accept free attendance at the Space Generation Congress Closing dinner, the IAA Awards dinner, and the IAF Dinner, but may only accept invitations to the other listed events if they reimburse the sponsor for the cost of the food and refreshments they consume. Note that attendance at the IAC Welcome Reception is included in the registration fee, so both career and non-career employees for whom the Government has paid the registration fee may attend without further payment.

A handwritten signature in black ink, appearing to read 'Adam F. Greenstone', with a long, sweeping horizontal flourish extending to the right.

Adam F. Greenstone